

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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**In re:**

**MLCJR LLC, *et al.*,<sup>1</sup>**

**Debtors.**

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**Chapter 7**

**Case No. 23-90324 (CML)**

**Jointly Administered**

**NOTICE OF ABANDONMENT OF DOCUMENTS AS  
AUTHORIZED BY PRIOR COURT ORDER [Doc. No. 2324]**

**PLEASE TAKE NOTICE** that:

1. On November 19, 2024, Michael D. Warner, solely in his capacity as chapter 7 trustee for the above-captioned administratively consolidated estates (the “**Trustee**”), filed that certain *Trustee’s Motion for Entry of An Order to Abandon Documents and Data and Dismantle and Destroy Certain Equipment* [Doc. No. 2293].

2. On December 18, 2024, the Court entered that certain *Order Granting Trustee’s Motion for Entry of An Order to Abandon Documents and Data and Dismantle and Destroy Certain Equipment* [Doc. No. 2324] (“the “**Abandonment Order**”).

3. Pursuant to the Abandonment Order, certain records of the Estates<sup>2</sup> are deemed abandoned pursuant to 11 U.S.C. § 554 and Federal Rule of Bankruptcy Procedure 6007 upon the Trustee filing a Notice of Abandonment into the docket of the Bankruptcy Case on or after the

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<sup>1</sup> The debtors in these cases (the “**Debtors**”), along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOL, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

<sup>2</sup> Capitalized terms used in this Notice but not otherwise defined shall have the meanings ascribed to them in the Abandonment Order.

sixtieth (60<sup>th</sup>) day following entry of the Abandonment Order and without further order of the Court.

4. Sixty days have passed since the Court entered the Abandonment Order on the docket of the Bankruptcy Case.

5. The Trustee files this Notice of Abandonment (the “**Notice**”) in accordance with the Abandonment Order, hereby notifying all persons of his immediate abandonment of the following property of the Estates under 11 U.S.C. § 554 and to the fullest extent authorized by the Abandonment Order (collectively, the “**Physical Records**”):

- a. Physical documents stored with The File Depot in or around the Covington, Louisiana area; and
- b. Physical documents stored with Iron Mountain in New Orleans, Louisiana and Houston, Texas.

6. Notwithstanding any other language contained in this Notice, at this time, the Trustee is abandoning only the Physical Records, identified in the preceding paragraph, and reserves all rights in, to, and upon, and is specifically not abandoning any other Records not listed herein.

7. For the avoidance of doubt and in compliance with the Abandonment Order, the Trustee will continue to maintain the Electronic Storage Center until the earlier of the date (a) the Bankruptcy Case is closed, or (b) an order approving its abandonment and/or destruction is entered by the Court. Nothing in this Notice should be construed as an intent to abandon the Electronic Storage Center; the Trustee reserves all rights in, to, and upon the Electronic Storage Center. For further avoidance of doubt, and without limiting the Trustee’s rights related to such Records, nothing in this Notice should be construed as an intent to abandon the approximately (i) 9,000

boxes of physical documents stored with VeriTrust Corporation in Houston, Texas and (ii) 420 boxes of physical documents stored with FileLink Document Solutions in Metairie, Louisiana, which Records are the subject of the *Trustee's Motion to Destroy Certain Property of the Estates* [Doc. No. 2420] filed contemporaneously herewith. For further avoidance of doubt, and without limiting the Trustee's rights related to such Records, nothing in this Notice should be construed as an intent to abandon the physical documents stored in Dallas at the Debtors' former office located at 4514 Cole Ave., Suite 1175, Dallas, Texas 75205.

**Signature on the following page**

Respectfully submitted,

**STEWART ROBBINS BROWN & ALTAZAN,  
LLC**

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